

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TAMIKA L. JACKSON,

Defendant.

X

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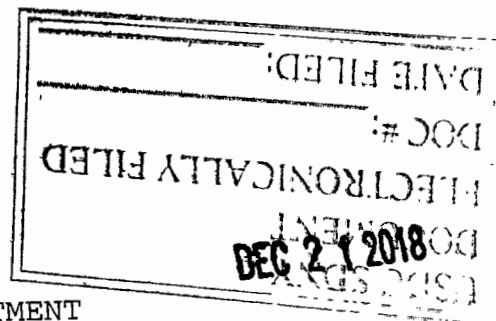
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X

INDICTMENT

18 Cr.



18 CRIM 909

COUNT ONE

(Attempted Bank Robbery)

The Grand Jury charges:

1. On or about August 30, 2018, in the Southern District of New York and elsewhere, TAMIKA L. JACKSON, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), to wit, JACKSON attempted to obtain money from a bank in Manhattan, by brandishing a firearm and demanding that a bank employee turn over to JACKSON money in the bank's custody.

(Title 18, United States Code, Sections 2113(a) and 2.)

JUDGE CARTER

COUNT TWO

(Firearms Use, Carrying, and Possession)

The Grand Jury charges:

2. On or about August 30, 2018, in the Southern District of New York, TAMIKA L. JACKSON, the defendant, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, the bank robbery charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United

States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

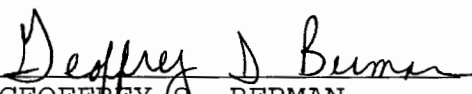
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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GEOFFREY S. BERMAN  
United States Attorney

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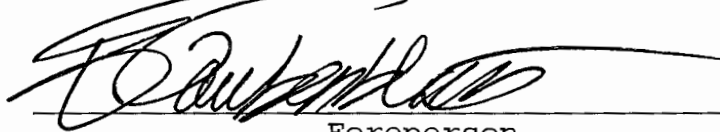
INDICTMENT

18 Cr.

(18 U.S.C. §§ 2113(a), 924(c)(1)(A)(ii),  
and 2.)

GEOFFREY S. BERMAN

United States Attorney



Foreperson

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December 21, 2018

Filed Indictment. Case assigned to Judge Carter  
U.S.M.J. Debra Freeman